

201-14441

May 1, 2003

BY EXPRESS MAIL and E-MAIL to EPA

Mr. Richard Hefter,
Chief of the HPV Chemicals Branch
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

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Re: US HPV Challenge Program Additional Submission for Silane, dichlorodimethyl-, reaction products with Silica, CAS RN 6861 I-44-9.

Dear Mr. Hefter,

On March 4, 2003, the Office of Pollution Prevention and Toxics transmitted EPA's comments on the robust summaries and test plan for Silane, dichlorodimethyl-, reaction products with Silica, CAS RN 6861 I-44-9, which was posted on the ChemRTK HPV Challenge Program Web site on November 4, 2002.

The HPV Consortia, consisting of Cabot Corporation, Degussa AG and Wacker-Chemie GmbH, appreciates the time and effort EPA put forth to review our documents and provide cogent and insightful comments to our submission.

In response to the EPA's recommendation that a combined reproductive / developmental toxicity study, such as OECD Test Guideline 421 be conducted to augment our test plan, the consortium offers the attached additional information in support of our position that no additional testing is needed nor required to understand the reproductive / developmental toxicity of the HPV Chemical Substance.

Regarding the other EPA comments concerning omissions and/or clarifications to our Robust Summaries, we have addressed all of the items noted in your letter dated March 4, 2003 and the changes are included in the revised IUCLID Data Set, attached to this letter.

Please contact me with any questions or concerns you may have with regards to this submission, I can be reached by telephone at [978] 671-4143 or by E-mail at Stewart _Miller@cabot-corp.com.

Sincerely,

Stewart H. Miller
Product Regulatory Affairs Manager
Corporate Safety, Health & Environmental Affairs

Attachments: 1. Additional Discussion of Reproductive / Developmental Toxicity for Silane,
dichlorodimethyl-, reaction products with Silica, CAS RN 6861 I-44-9;
2. Revised IUCLID Data Set